

REMARKS

Status of the Claims

Claims (Currently Amended) 1, 2, 4, 6, 11, 14, 15, and 16

Claims (Previously Presented) 5 and 10

Claims (Original) 3, 7-9, 12-13, and 17-20

Claim Rejections under 35 U.S.C. § 103

The Examiner has rejected claims 1-20 under 35 U.S.C. § 103(a) as being obvious over Jovicic (U.S. Patent 5,855,007). It is the Examiner's position Jovicic discloses the present invention except for "content data selected according to electronic profile data to create a computer display." Applicant has amended claims 1, 6, 11, and 16 to indicate 1) that model parameters according to the present invention are display model parameters indicating monitored user preferences for presentation of content data on a computer display based on the user's on-line behavior data regarding navigational choices and electronic user profile data and 2) that actual display characteristics, which are selected independently of content data, are based on electronic user profile data and the display model parameters indicating monitored user preferences for presenting content data on the computer display. In view of Applicant's amended claims, Applicant respectfully traverses the rejections.

Applicant respectfully submits that contrary to the Examiner's assertion, "content data selected according to electronic profile data to create a computer display" is not the only missing element with respect to the claims of the present invention. There are

other aspects of the claims of the present invention that Jovicic fails to explicitly teach or render obvious. Specifically, Jovicic fails to teach an electronic user profile data comprising on-line behavior data regarding navigational choices, content data selected according to a user's on-line behavior data, display model parameters that indicate monitored user preferences for presentation of content data on a display, and actual display characteristics that are selected independently of content data and that are based on the electronic profile data and the display model parameters. Jovicic fails to teach or render obvious these aspects of the present invention.

Jovicic teaches a coupon generating and redemption system and method that reduce the amount of time and effort expended by consumers in locating, clipping, and assembling coupons. A consumer accesses a web site and selects coupons that he would like to receive. The system then generates coupons based on the consumer's selections. Each coupon has database fields that are populated when the coupon is generated. Each coupon that is generated has a field with a unique serial number, a product image, a uniform product code, discount information, a product title, coupon owner's title, redemption specification, expiration date, consumer name, consumer identification number, and a personalized message for the consumer. Consumers may select coupons from the web site and print them for use at retail outlets. Consumers also have the option of electronically redeeming the coupons. Because each coupon has a unique serial number that is associated with a consumer identifier, it is possible to determine when a coupon is redeemed and who redeemed it.

Although the content of each coupon may be varied (i.e., the coupon serial number, product image, product title, consumer name, personalized message, etc. may be different for each coupon), the presentation of the content for each coupon of a particular product is the same. The number of data items that appear on each coupon of a particular product is not varied and the placement of the content on each coupon of a particular product is not varied. The database fields for each coupon are simply populated based on the user's selections and the coupon is generated using "coupon elements" which are a combination of the database fields for the coupon and the content used to populate the database fields. Content is customized so that coupons for individual consumers can be tracked. Although Jovicic teaches *customization of content* appearing on a coupon, it does not teach or even suggest *customization of content presentation* (i.e., variations in presentation of content based on monitored user preferences) as set forth in Applicant's claims. Customization of content presentation is not even relevant to the purpose and goals of Jovicic, and therefore, is not disclosed.

In contrast to the teachings of Jovicic, Applicant's invention allows content presentation, as well as content, to be customized for each user. Content presentation is customized using display model parameters, general display characteristics, and actual display characteristics. General display characteristics indicate which characteristics or elements of the display may be varied (e.g., how many different opportunities may be presented on a particular display (i.e., total number of items that may be displayed) as well as how many colors may be used (e.g., for background, for borders, for individual items, etc.), where graphics may be displayed (e.g., in the center,

on sides, etc.), what shape items have (e.g., round, square, rectangular, etc.)). Display model parameters indicate monitored user preferences for presentation of content (e.g., total number of items that user prefers to see, colors user prefers to see including colors for background, for borders, for individual items, etc., graphics user prefers to see, and items (e.g., round, square, rectangular) user prefers to see. Users do not explicitly set their preferences. Instead, their navigational behavior may be used to determine monitored preferences. Once the user's display model parameters are determined (based on the user's online behavior), the general display characteristics (which indicate how the display presentation characteristics may be varied) and the display model parameters (monitored user preferences for display presentation characteristics) may be analyzed to determine actual display characteristics (a display customized for the user according to the user's monitored display presentation preferences).

Applicant respectfully submits that the amended claims indicate clearly that content such as merchant data or account data is presented in unique displays that conform to monitored user preferences for presentation of content as determined from display model parameters that identify a user's preferences according to navigational behavior. Content presentation preferences are determined by analyzing a user's online behavior and determining from the user's behavior what preferences for presentation of content he or she has. The amended independent claims of the present application indicate that monitored user preferences are used to customize content. Applicant respectfully submits that the Jovicic reference does not teach or even suggest

monitoring user preferences to customize content presentation and therefore, cannot support the present rejections.

In view of the foregoing amendments and remarks, Applicant respectfully submits that the present application is now in condition for allowance and respectfully requests such action.

Respectfully submitted,

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